

In re Application of: Irun R. COHEN et al
Serial No.: 10/542,591
Filed: March 14, 2006
Office Action Mailing Date: January 5, 2010

Examiner: Edward Martello
Group Art Unit: 2628
Attorney Docket: 30070
Confirmation No.: 6831

REMARKS

Reconsideration of the above-identified application in view of the amendments above and the remarks following is respectfully requested.

Claims 1-33 are in this Application. Claims 13-33 have been withdrawn from consideration. Claims 1-10 and 12 have been rejected under 35 U.S.C. § 102. Claim 11 has been rejected under 35 U.S.C. § 103.

Claim 1 is amended.

Objections to the Drawings

The replacement drawings were objected to as lacking the labeling of replacement drawings. While they have been, please see PAIR entry dated September 17, 2009 (between Transmittal Letter and Extension of Time), Applicant is submitting another set of Replacement Drawings.

Rejections Of The Claims

35 U.S.C. § 102 Rejections

The Examiner rejected claims 1-10 and 12 under 35 U.S.C. § 102 (b) as being anticipated by Mochizuki et al 684. The rejections of the Examiner are respectfully believed to have been overcome in light of the above amendment and the following arguments.

Mochizuki is concerned with minimizing computational load on the animation side, in their case the client side. That is, Mochizuki ensures that as much computation is carried out on the server side.

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However, Mochizuki does not mention any reactive system abilities. That is, a major part of our invention is in the pairing of reactive technology with animation technology. All that Mochizuki does when detecting an event is that he makes a judgment about the time (process 69) and then considers whether to enter process 70 and alter the time line or process 72 and insert a connecting motion.

That is to say, Mochizuki does not teach any creation of animation "on the fly". Rather they dissociate animation from computation, but the animation still has to be pre-specified in some manner. So the the overall animation in Mochizuki is known, all that is changed is the time scale and connecting motion – see seventh and eighth stages.

By contrast, in reactive animation as presently claimed, it is actually impossible to know what the animation might look like, as different objects may initialize different animation sequences, whose combined effects will generate animated objects of higher complexity.

Mochizuki fails to teach a behavior model (a reactive system) which specifies the behavior of the whole system within a single overall flow. A reactive system visualizes the concept of the system by using diagrammatic tools that do not only visually portray behavior but are also machine legible and therefore executable.. Such a reactive system can be implemented, for example by using Unified Modeling Language (UML) which is a language used in the art for specifying large complex systems.

Page 3 lines 15-18 states: "the present invention therefore preferably enables a reactive system to be connected to an animation tool, for producing true reactive

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animation." The same page line 21 states "the combination provides a vivid representation built on a rigorous, hard core model of the system under description."

The lines in claim 1 " providing a reactive model of system *overall* behavior; and creating animation primitives for animating said mode" reflect this difference.

Mochizuki is entirely silent about *overall* behavior. All Figure 5 of Mochizuki teaches is about making a judgment about a connecting period – Mochizuki Fig. 5 process 69.

The Examiner points to processes 61 to 78 as referring to a reactive model of system overall behavior, but there is no teaching of modeling behavior. Nevertheless, even if modeling behavior were taught, and applicant does not accept that it does, the claim requires that the *modeling* of the overall behavior is carried out in the *first environment* and the event detection etc is carried out in the *runtime* environment.

Examiner by construing providing the model as covering steps 61 – 78, requires all the features shown in Fig. 5 to be part of the first environment. Therefore none of the features of the claim defined as being in the runtime environment can possibly be present in Fig. 5, since Fig. 5 does not teach two environments.

Hence by the Examiner's own construction of the feature of

In a *first* environment:

providing a reactive model of system overall behavior;

none of the following features are present in Mochizuki, namely:

"In a *runtime* environment, said runtime environment being different from said first environment:

detecting events associated with said system;

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selecting respectively animation primitives according to said model of overall system behavior and said events; and

combining together said respective animation primitives representing said detected events; thereby to create an overall animation."

In any event the Examiner cites for support of the runtime environment the abstract of Mochizuki. The abstract of Mochizuki is *silent* about a runtime environment, certainly in contrast to *another* environment (any equivalent of the first environment of the claim).

Figure 5 of Mochizuki does teach that processes 61 to 64 are carried out on the server and processes 65 to 78 are carried out on the client computer. However these cannot be construed as the two environments of the claim because then the modeling and using the second tool (encompassing processes 65 – 78) occur in the *same* environment as the selecting and combining together of the primitives after event detection. This is contrary to the requirement of the claim which requires them to be in two *different* environments.

In view of the above amendments and remarks it is respectfully submitted that claim 1 is novel and inventive over the cited prior art. Claims 2 – 12 depend from allowable claim 1.

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Hence claims 1-12 are now believed to be in condition for allowance. A prompt notice of allowance is respectfully and earnestly solicited.

Respectfully submitted,

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Enclosures:

- Petition for Extension (Two Months)
- Request for Continued Examination (RCE)
- Formal Drawing Transmittal Sheet
- Complete Set of Replacement Drawing Sheets